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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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KI DONG JUNG	:
on behalf of himself and others similarly situated,	: Case No.: 2:13 Civ. 4020
	: (JS)(WDW)
Plaintiff,	:
	:
-against-	:
	:
MAL SOON KIM, YEO HAN KIM and	:
INTERNATIONAL LEATHER CARE COMPANY CORP.:	:
	:
Defendants.	:
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DECLARATION OF WILLIAM C. RAND, ESQ.

I, William C. Rand, hereby declare under penalty of perjury that the following is true:

1. I am the attorney for the named plaintiff in this action. I make this declaration in connection with Plaintiffs' Motion for Leave To File an Amended Complaint.
2. I have attached the proposed Amended Complaint hereto as Exhibit A.
3. The Amended Complaint (a) clarifies the language pleading an FLSA collective action, (b) adds as named plaintiffs the two opt-in FLSA Plaintiffs, Oscar Mori and Rudy Valdez (whose consents were previously filed with the Court on February 28,

2014) and (c) on their behalf adds state law wage claims.

4. The amended complaint is necessary as it will prevent the opt-in plaintiffs from filing additional actions to seek recovery under their state law claims, which are not covered by their consents to join as opt-in plaintiffs.

5. Accordingly, Plaintiff requests that the Court grant Plaintiff's motion for leave to amend the complaint. *See Foman v. Davis*, 371 U.S. 178, 182, (1962) (leave to amend or replead a complaint is to be "freely given when justice so requires.") (quoting Fed. R. Civ. P. 15(a)).

Dated: May 7, 2013

s/William C. Rand

William C. Rand, Esq.
Attorney for Plaintiffs